

UNITED STATES DISTRICT COURT

for the
District of Nebraska

United States of America

v.

TAYLOR MICHAEL WILSON

*Defendant(s)***SEALED**

Case No.

4:17MJ3157

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 22, 2017 in the county of Furnas in the
District of Nebraska, the defendant(s) violated:*Code Section*

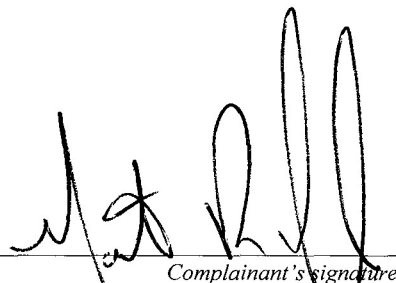
18 USC 1992(a)(1) & (b)(1)

Offense Description

On or about the 22nd day of October, 2017, in the District of Nebraska, the defendant, TAYLOR M. WILSON, did knowingly and without lawful authority or permission attempt to and threaten to wreck, derail, and disable railroad on-track equipment to wit, an Amtrak train, a railroad carrier engaged in interstate and foreign commerce, and in order to commit the offense, the defendant traveled and communicated across a state line, from California to Missouri, and the railroad on-track equipment or mass transportation vehicle was carrying a passenger or employee at the time of the offense.

This criminal complaint is based on these facts:

See attached Affidavit of Special Agent Monte Czaplewski.

☒ Continued on the attached sheet.*Complainant's signature*

MONTE CZAPLEWSKI, SPECIAL AGENT

Printed name and title

Presented before the court by reliable electronic means on:

Date: **Dec 22, 2017**City and state: LINCOLN, NEBRASKA*Judge's signature*

CHERYL R. ZWART, U.S. MAGISTRATE JUDGE

Printed name and title

I, Monte R. Czaplewski, Special Agent (SA), Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

1. Your Affiant has been a Special Agent of the FBI for sixteen years and have been assigned to the Grand Island, Nebraska, Resident Agency (GIRA) of the FBI since 2006. Prior to assignment to the GIRA Your Affiant was assigned to a violent crimes and drug squad in the Laredo, Texas Resident Agency of the FBI. Prior to employment as a Special Agent with the FBI, your Affiant was employed as a Special Agent in Charge with the United States Department of Transportation/National Highway Traffic Safety Administration in Washington, D.C. for approximately four years and as Chief Investigator and Senior Investigator with the Texas Department of Transportation/Motor Vehicle Division for approximately three years.

2. As an FBI Special Agent, your Affiant is authorized to investigate violations of the laws of the United States of America. Your Affiant is a sworn law enforcement officer with authority to execute arrest and search warrants issued under the authority of the United States of America. Your Affiant is assigned to criminal investigative matters and is responsible for investigations of federal crimes, to include firearms, violent crime, transportation, and domestic terrorism matters.

3. This affidavit is being submitted for the limited purpose of supporting a criminal complaint and establishing probable cause to obtain an arrest warrant. The statements contained in this Affidavit are based on documents gathered during the course of this investigation; on interviews conducted during the course of this investigation; and on my experience and background as a Special Agent of the FBI and the experience of other Special Agents of the FBI, as well as other law enforcement officers with extensive knowledge of criminal investigations. Thus, I have not set forth each and every fact learned during the course of the investigation.

4. This affidavit is respectfully submitted in support of a Criminal Complaint and Arrest Warrant for TAYLOR MICHAEL WILSON (WILSON), age 26,¹ currently residing at 3208 Lightfoot Drive, St. Charles, Missouri. The facts and circumstances set forth in this affidavit demonstrate that there is probable cause to believe that, among other laws, WILSON has violated 18 U.S.C. § 1992 (Terrorism Attacks and Other Violence Against Railroad Carriers and Against Mass Transportation Systems on Land, or Water, or Through the Air), 18 U.S.C. § 875 (Threats), 18 U.S.C. § 245 (Federally Protected Activities) and 18 U.S.C. § 1991(a)(1)(b)(1) (Violence Against Railroad Carriers) by illegally entering a restricted area and engaging the emergency braking system with intent to harm those aboard on an interstate rail service/carrier (Amtrak) engaged in interstate commerce.

5. The statements contained in this Affidavit are based on documents and statements gathered during the course of this investigation; on interviews conducted during the course of this investigation; and on my experience and background as a Special Agent of the FBI and the experience of other FBI Special Agents as well as other law enforcement officers with extensive knowledge of criminal investigations. Since this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation.

6. Your Affiant alleges that the facts contained in this Affidavit demonstrate that there is probable cause to believe that TAYLOR M. WILSON has committed the following violation(s) of federal criminal law: Entering a train to commit crime, 18 U.S.C. Section 1991 and Terrorist attacks and other violence against railroad carriers and against mass transportation systems on land, or water, or through the air, 18 U.S.C. Section 1992 (a)(1) (b)(1), by illegally

¹ Your Affiant has obtained full date of birth, addresses and other Personally Identifying Information for WILSON.

entering a restricted area and engaging the emergency braking system with intent to harm those aboard on an interstate rail service/carrier (Amtrak) engaged in interstate commerce.

7. Your Affiant submits there is probable cause to believe that electronic devices owned, utilized and/or possessed by WILSON and firearms owned or possessed by WILSON have been used for or obtained in anticipation of engaging in or planning to engage in criminal offenses against the United States as set forth in the background detail below.

BACKGROUND

8. On Monday 10/23/2017, FBI Omaha received a report that on 10/22/2017 at approximately 2:00 a.m., that the Furnas County (Nebraska) Sheriff's Office (FCSO) in Beaver City, Nebraska, received a 911 call from an Amtrak Conductor who requested law enforcement assistance. An Amtrak train traveling through Furnas County near Oxford, Nebraska, was delayed by a passenger who breached a secure area of the train and triggered an emergency stop control panel, applying the emergency brakes and causing the train to stop in an expedited (emergency) fashion. The passenger was detained by the train engineer and other Amtrak personnel outside the train and local law enforcement was contacted. As the area near Oxford, Nebraska is a very rural area, it took approximately one hour for the closest Deputy from the FCSO to arrive on scene. The Deputy witnessed Amtrak personnel physically restraining a single, white male later identified as TAYLOR MICHAEL WILSON on the ground. WILSON was handcuffed and helped to a standing position by the deputy and asked numerous times if he had any weapons, to which WILSON either would reply to the negative or not respond. During a subsequent search of WILSON's person, the deputy patted down the front of WILSON's pants and upon feeling a bulge in WILSON's front left pocket, the Deputy asked, "What is this," and WILSON replied, "My dick." The deputy located a fully loaded speedloader with .38 bullets and

upon further searching located a fully loaded 38 caliber handgun in WILSON's front waistband. WILSON would not tell Amtrak staff if he had any belongings, but passengers on the train identified a backpack belonging to WILSON which contained three additional loaded speed loaders, a box of .38 ammunition, a hammer, a fixed blade knife, tin snips, scissors, a tape measure and a respirator-style (i.e. 3M) mask similar to ones used in construction trades. WILSON did not and would not provide any information to law enforcement and invoked his rights. Amtrak crew members confirmed WILSON had a ticket and was enroute from Sacramento, California to Missouri. WILSON was arrested and charged with Use of a Deadly Weapon to Commit a Felony and Felony Criminal Mischief (local charges) and transported to the Furnas County Jail.

9. Upon booking at the FCSO and during an inventory of additional items, WILSON was found to be in possession of (1) a business card for the NATIONAL SOCIALIST MOVEMENT, P.O. Box 13768, Detroit, MI, 48213, telephone (651) 659-6307, www.nsm88.org;² (2) a business card for the Covenant Nation Church, William Davidson, Preacher, Oneonta, Alabama, 35121 with the inscription "Covenant Nation Church of the Lord Jesus Christ. Conquer we must, for our cause is just!"³

10. Investigation showed WILSON has no criminal history other than a traffic citation and is the holder of a valid Missouri Concealed Handgun permit. Additional inquiries then revealed WILSON was a suspect in a road rage incident in Saint Charles, Missouri, on 4/16/2016. According to the St. Charles police report, the victim, a black female, stated a white

² The www.nsm88.org website for the NATIONAL SOCIALIST MOVEMENT states the following on the banner of the website's cover, *"Putting Family, Race and Nation First while Fighting to Secure American Jobs, Manufacturing & Innovation"* *"America's Premier White Civil Rights Organization - Fighting for White Civil Rights"*

³ WILLIAM DAVIDSON was interviewed by FBI Agents on 11/28/2017 and stated to interviewing Agents that "The Covenant Nation Church of the Lord Jesus Christ" is a "Christian Identity" church, which is based on the belief that "White people are part of the Lost Ten Tribes of Israel."

male in a Green SUV pointed a handgun at her while driving eastbound on Interstate 70 for no apparent reason. The victim told police the vehicle, a green SUV bore license plate AH3K5M. The plate was then traced back to Taylor Wilson. Wilson inexplicably tried to turn himself into police custody by contacting park rangers at Kiwanis Park in St. Charles, but would not state the reason. The Saint Charles Police Department contacted WILSON and WILSON told them he wanted to be charged for an offense but he had nothing to say without an attorney. After putting together a photo lineup which included a photograph of WILSON, the Saint Charles PD attempted to but was unable to locate the victim in the matter so the case was placed in inactive status.

11. On 10/24/2017, at approximately 2:22 p.m., Your Affiant met with WILSON at the Furnas County Jail in Beaver City, Nebraska. WILSON was directed not to discuss nor would any questions be asked about WILSON's current state charges, however, investigators wished to speak with WILSON about any social media accounts WILSON maintained and to seek WILSON's consent to search his (WILSON's) cellular telephone. WILSON refused and stated he was not going to cooperate nor consent to any searches.

12. On 10/24/2017 at approximately 3:55 p.m., WILSON placed a call from the Furnas County Jail to his parents, MICHAEL D. WILSON and ANN S. WILSON. As is Furnas County Jail policy, all jail calls are recorded. ANN WILSON told WILSON that they (ANN and MICHAEL WILSON) were going to travel to see WILSON in jail on 10/30/2017. WILSON told his mother that the FBI had talked to him (WILSON) and that should the FBI "come by make sure they have a search warrant." ANN WILSON told WILSON that the media had picked up on the news story about WILSON's conduct and WILSON asked "What'd, what did it say?" (referencing the media reports) and ANN WILSON stated, "Armed man from St. Charles County

pulled a...made his way to the engineering car of an Amtrak rail car and pulled the emergency cord and stopped the train...and that you were, had in your waistband a Smith and Wesson .38 with a reloading and other ammunition in your bag as well as wire snips and a gas mask.”

WILSON replied, “That’s it?” ANN WILSON quickly admonished WILSON by stating, “You know this call is being recorded” and WILSON replied “Yeah, I know.”

13. On 10/30/2017, WILSON’s parents, MICHAEL D. WILSON and ANN S. WILSON were interviewed by the FBI regarding their knowledge of Taylor Wilson's activities. The interview took place at the offices of the Furnas County Sheriff. The WILSONs relayed their son lives with and had accompanied his cousin ANDREW OLNEY (herein “CW #1”), who is ANN WILSON's nephew, on a trip to California to attend a college visit on 10/17/2017, but the meeting was postponed due to California wildfires. TAYLOR WILSON was reportedly returning to Saint Charles via Amtrak so he could attend classes on 10/23/2017. The WILSONs stated they did not know the address where CW #1 and TAYLOR WILSON live, but they indicated that it is in Saint Charles, Missouri. The WILSONs stated TAYLOR WILSON had several, legally purchased firearms and a concealed carry permit, but claimed they had never heard of the National Socialist Movement or the Covenant Nation Church and they had never known their son to be involved with drugs or the white supremacist movement. The WILSON's stated they had no idea why TAYLOR WILSON would have activated the emergency braking system on the Amtrak train or the nature of his subsequent intentions.

14. On 10/30/2017 the Furnas County Sheriff’s Office obtained a search warrant for WILSON'S cellular phone and requested the FBI to conduct the examination. Video and documents from the phone depict the placement of a white supremacist banner with the

annotation ““Hands up don’t shoot” is Anti-white fake news – Altright””over an unknown highway and other related postings and videos. Several documents and pamphlets saved on the phone in PDF files, described as “100 Deadly Skills,” a series of individual PDF files, each with a skill related to killing people, copies of “The Anarchists Cookbook” and “Poor Man’s James Bond volume 5” by Kurt Saxon, The Ranger Handbook, The Ultimate Sniper by John L. Plaster and other documents were also located in saved/downloaded files on WILSON’s phone. Based on your Affiant’s experience and the experience of others, the described documents are often possessed and utilized by individuals and groups attempting or planning to commit criminal acts or acts of terrorism or violence.

15. On 11/16/2017 your Affiant conducted a telephonic interview of FRANCISCO WILLIAMS, who was the Assistant Passenger Conductor on duty when WILSON actuated the emergency brakes. WILLIAMS stated he had brief interaction with WILSON prior to the incident when WILSON saw WILLIAMS’ name tag (F. WILLIAMS) and referred to him as “F. Williams.” WILLIAMS later felt the train in emergency braking and began searching the train for the person or incident causing it. WILLIAMS and other staff witnessed WILSON seated in the engineer’s seat of the follow engine and WILLIAMS described WILSON as “playing with the controls.” The Conductor, DANA YEE was trying to subdue WILSON as WILSON appeared to try to escape the area. WILLIAMS stated YEE was trying to get WILSON to calm down and WILSON stated, “Fuck that, what are you going to do, shoot me?” WILLIAMS described WILSON as calm then agitated. When WILSON saw WILLIAMS he stated, “I know you F. Williams.” YEE and others were attempting to control WILSON, however, WILSON was trying to break free and several times attempted to reach towards the area of his front waistband.

After the Amtrak staff subdued and detained WILSON WILLIAMS asked WILSON why he (WILSON) actuated the brakes and WILSON only replied, "I want your job."

16. On 11/17/2017 your Affiant conducted a telephonic interview of EVAN DURST, who was the Conductor on duty with FRANCISCO WILLIAMS during the incident with WILSON. DURST stated when he (DURST) and others located WILSON at the controls of the engine, WILSON was "lucid then would start saying crazy things about going to the moon." DURST stated after WILSON was removed from the engineer's chair, WILSON continually repeated, "What are you going to do, shoot me?" DURST also stated while WILSON was subdued he (WILSON) continually goaded DURST and other staff members by telling them, "I'm the conductor, bitch" while exhibiting what DURST referred to as drastic mood swings.

17. On 11/17/2017, CW #1 was interviewed by FBI St. Louis at a residence CW#1 and WILSON shared, which is located 210 Reservoir Avenue, St. Charles, MO 63301. The residence is further described as a single family dwelling owned by ANN and MICHAEL WILSON⁴. CW #1 stated WILSON has been acting strange since he moved in with WILSON in June of 2017. CW #1 stated WILSON had joined an "alt right" Neo-Nazi group that he (WILSON) had found researching white supremacy forums on-line. CW #1 does not know WILSON's friends or other members in the group, but he did briefly meet some of them when they came to the house to walk down to Old Town St. Charles. CW #1 lived with WILSON at this residence from June, 2017, to October 22, 2017, the date of WILSON'S arrest in Furnas County, Nebraska, on state charges. On December 11, 2017, WILSON was released on bond

⁴ On 10/30/2017 ANN and MICHAEL WILSON told FBI Omaha Agents during the course of their interview that they did not know where TAYLOR WILSON resided, only that it was "in an apartment somewhere" in the St. Louis area. A subsequent search of property records by the FBI revealed the residence at 210 Reservoir Avenue, St. Charles, MO is owned by ANN S. WILSON. Further, ANN and MICHAEL WILSON told interviewing Agents that they would not discuss any discussions they had with TAYLOR WILSON regarding race relations.

from Furnas County Court and listed on the bond that he would be residing pending trial in state court at 3208 Lightfoot Drive, St. Charles, Missouri, the residence of his parents.

18. CW#1 reported that WILSON traveled with members of the “alt-right” Neo Nazi group to the protests in Charlottesville, Virginia (believed to be the Unite the Right rally in August, 2017 which was reported nationally due to the violent nature of the protests). CW #1 advised he knew a lot of the guys took guns with them, but he did not know for certain if WILSON took anything other than a shield and a bulletproof vest. CW #1 stated WILSON normally carries a nine millimeter handgun or a .38 caliber revolver on his person. CW #1 also stated WILSON has shown him between twenty and twenty-five guns that he owns, including an AK47, AR-15’s and an M-4 rifle (approximately ten rifles and ten handguns) which were at the residence.

19. CW #1 stated WILSON has expressed an interest in “killing black people” and others besides whites, especially during the protests in St. Louis. WILSON made statements that CW #1 interpreted as WILSON representing to CW #1 that WILSON and his white supremacist group were the ones who put up some “Whites Only” signs in businesses at an unknown location and CW #1 believes WILSON is serious about killing black people. WILSON told CW #1 about an incident in which WILSON had become angry and pointed a gun at somebody while driving down the highway but no further information was given. This statement by CW #1 fits with the general description of the road range incident reported to St. Charles authorities on April 16, 2016 and increased the reliability of CW #1’s information. Shortly after CW#1 was interviewed, CW#1 recontacted the interviewing agent and stated WILSON utilizes a hidden compartment behind the wall of the refrigerator in the residence to hide items.

20. Your Affiant collected and reviewed video footage captured from the bodycameras worn by the two responding Deputies during the incident on 10/22/2017. The Harlan County Deputy notated the following times on the cover of the footage, “15:15-15:20” and “21:45-21:50.” Your Affiant reviewed the video and at the approximate 15:15 minute mark of the video WILSON is off-camera but can be heard taunting Amtrak staff and repeated telling someone in an agitated voice, “Don’t look at me.” At the approximate 21:45 minute mark WILSON is seen joking and laughing while telling the Deputy, ““Bro, habib over there was like, “what the fuck”” while WILSON indicated via head nod to an Amtrak staff member off camera.

21. On 12/13/2017 FBI St. Louis obtained a Federal Search Warrant from the Eastern District of Missouri for WILSON’s residence, located at 210 Reservoir Avenue, St. Charles, Missouri. The warrant stated property to be seized included firearms, body armor, ammunition, records and information relating to violent acts, travel records, records of communication of threats or detailing instructions pertaining to committing acts of violence against others, documents concerning white supremacy and digital media devices.

22. On 12/ 21/2017, FBI St. Louis executed the search warrant on the residence. Agents located the hidden compartment behind the refrigerator. Your Affiant reviewed photographs taken at the time of the search and the compartment appears to be an area under a stairway that has been walled off, with the back of the refrigerator butting up against the wall which supports the stairs. The access panel was well camouflaged to not readily appear to be removable and was held in place by trim pieces which held it in place. Upon removing the panel agents discovered a large amount of evidence to include a tactical vest, 11 AR-15 (rifle) ammunition magazines with approximately 190 rounds of .223 ammunition, one drum-style ammunition magazine for a rifle, firearms tactical accessories (lights), 100 rounds of 9mm

ammunition, approximately 840 rounds of 5.45x39 rifle ammunition, white supremacy documents and paperwork, several additional handgun and rifle magazines, gunpowder, ammunition reloading supplies, and a pressure plate⁵. Also located in the compartment was a hand-made shield, which your Affiant believes to be the same one referenced in the interview with CW#1.

23. During the execution of the search warrant, WILSON's father, MICHAEL WILSON arrived and spoke with FBI agents. During the course of the discussion it became evident that MICHAEL WILSON had knowledge of both the existence and location of WILSON's firearms. After MICHAEL WILSON consulted with his attorney, MICHAEL WILSON later that afternoon provided agents with the firearms. MICHAEL WILSON provided agents with 15 firearms to include handguns and rifles, ammunition and firearms magazines, and a tactical body armor carrier with ceramic ballistic plates.

24. On 12/22/2017 your Affiant was contacted by FBI St. Louis and was informed that Special Agents with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) had conducted a cursory inspection of the 15 firearms in FBI evidence and determined one firearm, a Pioneer Arms Corporation Model PPS43-C rifle bearing serial number MA-16438, was a fully automatic rifle. Further, a CZ Scorpion Evo 3 was converted to a short rifle, both in possible violation of federal firearms laws.

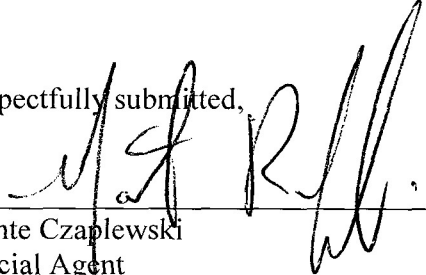
25. On 12/22/2017 your Affiant confirmed with the Furnas County Sheriff that during the course of the ongoing state case against WILSON, WILSON was ordered to have a

⁵ A Pressure Plate was described as two long rectangular pieces of metal that are separated and are designed to contact under pressure causing a full circuit. According to FBI St. Louis Special Agent Bomb Technicians who examined the evidence a pressure plate is a common device used in the construction of Improvised Explosive Devices (IED's).

25. On 12/22/2017 your Affiant confirmed with the Furnas County Sheriff that during the course of the ongoing state case against WILSON, WILSON was ordered to have a Competency Evaluation and subsequent Competency Hearing, of which WILSON was deemed competent to proceed.

26. Your affiant requests that this application and any resulting order be sealed because disclosure of this application and the facts contained within it may seriously jeopardize the ongoing investigation or place witnesses at risk or result in the modification or destruction of evidence or cause targets to flee or modify activities.

Respectfully submitted,



Monte Czaplewski
Special Agent
Federal Bureau of Investigation

Presented before the court by reliable electronic means on:

Date: Dec 22, 2017



CHERYL R. ZWART
UNITED STATES MAGISTRATE JUDGE